

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	:	<b>CRIMINAL NO.</b>
	:	
<b>v.</b>	:	<b>DATE FILED: ____</b>
	:	
<b>KEVIN DOCKERY</b>	:	<b>VIOLATIONS:</b>
<b>KEVIN WILLIAMS</b>	:	<b>21 U.S.C. § 846 (conspiracy to distribute</b>
	:	<b>and possess with intent to distribute</b>
	:	<b>controlled substances – 1 count)</b>
	:	<b>21 U.S.C. § 841(a)(1) (possession with</b>
	:	<b>intent to distribute and distribution of</b>
	:	<b>cocaine base (“crack”) – 5 counts)</b>
	:	<b>18 U.S.C. § 924(c) (possession of a firearm</b>
	:	<b>in furtherance of a drug trafficking crime</b>
	:	<b>– 1 count)</b>
	:	<b>18 U.S.C. § 922(g)(1) (possession of a</b>
	:	<b>firearm by a convicted felon - 2 counts)</b>
	:	<b>18 U.S.C. § 2 (aiding and abetting)</b>
	:	<b>Notice of forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

From on or about September 9, 2008 to on or about September 19, 2008, in  
Philadelphia, in the Eastern District of Pennsylvania, defendants

**KEVIN DOCKERY and**  
**KEVIN WILLIAMS**

conspired and agreed together to knowingly and intentionally distribute and possess with intent  
to distribute a mixture and substance containing a detectable amount of cocaine base (“crack”), a  
Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1),  
(b)(1)(B); and a mixture and substance containing a detectable amount of marijuana, in violation

of Title 21, United States Code, Section 841(a)(1), (b)(1)(D).

### **MANNER AND MEANS**

It was part of the conspiracy that:

1. Defendants KEVIN DOCKERY and KEVIN WILLIAMS made street sales of cocaine base (“crack”), outside of their residence located at 1724 Huntingdon Street in Philadelphia.
2. Defendants KEVIN DOCKERY and KEVIN WILLIAMS kept their stash of cocaine base (“crack”) and marijuana, including more than 500 individual packets of crack, inside of 1724 Huntingdon Street in Philadelphia.
3. Inside 1724 Huntingdon Street, defendants KEVIN DOCKERY and KEVIN WILLIAMS possessed: new and unused pink and purple packets to package cocaine base (“crack”); thirty (30) small clear packets with orange markings containing marijuana; and a loaded Sears 20 Gauge Shotgun, serial number P524560.

### **OVERT ACTS**

In furtherance of the conspiracy and to accomplish its objects, defendants KEVIN DOCKERY and KEVIN WILLIAMS committed the following overt acts, among others, in Philadelphia, in the Eastern District of Pennsylvania:

1. On or about September 9, 2008, defendant KEVIN WILLIAMS sold one red-tinted packet of cocaine base (“crack”) to Person #1, known to the grand jury, outside 1724 Huntingdon Street in Philadelphia.
2. On or about September 16, 2008, defendant KEVIN WILLIAMS sold one pink-tinted packet of cocaine base (“crack”) to Person #1 outside 1724 Huntingdon Street in

Philadelphia.

3. On or about September 17, 2008, defendant KEVIN WILLIAMS sold one red-tinted packet of cocaine base (“crack”) to Person #1 outside 1724 Huntingdon Street in Philadelphia.

4. On or about September 19, 2008, defendant KEVIN WILLIAMS sold one purple-tinted packet of cocaine base (“crack”) to Person #1 outside 1724 Huntingdon Street in Philadelphia.

5. Later the same day, on or about September 19, 2008, as Philadelphia Police officers were executing a search warrant at 1724 Huntingdon Street, defendant KEVIN DOCKERY attempted to toss more than 500 purple-tinted packets of cocaine base (“crack”) out of a window in the rear bedroom of the residence.

All in violation of Title 21, United States Code, Section 846.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 9, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**KEVIN WILLIAMS**

knowingly and intentionally distributed, a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 16, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**KEVIN WILLIAMS**

knowingly and intentionally distributed, a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 17, 2008, in Philadelphia, in the Eastern District of  
Pennsylvania, defendant

**KEVIN WILLIAMS**

knowingly and intentionally distributed, a mixture and substance containing a detectable amount  
of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 19, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**KEVIN WILLIAMS**

knowingly and intentionally distributed, a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(C).

**COUNT SIX**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 19, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KEVIN DOCKERY and  
KEVIN WILLIAMS**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, five grams or more, that is approximately 32.61 grams, of a mixture and substance containing a detectable amount of cocaine base (“crack”), a Schedule II controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), and Title 18, United States Code, Section 2.



**COUNT SEVEN**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 19, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KEVIN DOCKERY and  
KEVIN WILLIAMS**

knowingly possessed a firearm, and aided and abetted the possession of a firearm, that is, a Sears 20 Gauge Shotgun, serial number P524560, loaded with one round, in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, that is, conspiracy to distribute and possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 846, and possession with the intent to distribute a controlled substance in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Sections 924(c)(1) and 2.

**COUNT EIGHT**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 19, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendants

**KEVIN WILLIAMS,**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Sears 20 Gauge Shotgun, serial number P524560, loaded with one round.

In violation of Title 18, United States Code, Sections 922(g)(1), and 924(e).

**COUNT NINE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 19, 2008, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**KEVIN DOCKERY,**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Sears 20 Gauge Shotgun, serial number P524560, loaded with one round.

In violation of Title 18, United States Code, Section 922(g)(1).

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

As a result of the violations of Title 18, United States Code, Sections 924(c) and 922(g)(1), set forth in this indictment, defendant

**KEVIN DOCKERY and  
KEVIN WILLIAMS**

shall forfeit the firearm and ammunition involved in the commission of these offenses, including, but not limited to: 1) one Sears 20 Gauge Shotgun, serial number P524560; and 2) one round.

All pursuant to Title 28, United States Code, Section 2461(d), and Title 18, United States Code, Section 924(d).

**A TRUE BILL:**

**GRAND JURY FOREPERSON**

**LAURIE MAGID  
Acting United States Attorney**